



THE CITY OF NEW YORK

LAW DEPARTMENT

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June 6, 2008

VIA FACSIMILE (Fax: (212) 805-4268)

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

Re: Tamara Golsten-Green v. New York City Police Department, et al.
08 Civ. 4077 (RMB)(GWG)

Dear Judge Gorenstein:

I am an Assistant Corporation Counsel in the Labor and Employment Law Division of the New York City Law Department and the attorney assigned to the defense of the New York City Police Department ("NYPD"). I am writing to respectfully request a thirty (30) day extension of time, from June 9, 2008 until July 9, 2008, within which the NYPD may answer or otherwise respond to the complaint. Plaintiff, who is currently proceeding *pro se*, consents to this request.¹ This is the NYPD's first request for an extension of time to answer or otherwise respond to the complaint.

The reason for this request is that the NYPD needs additional time to properly investigate plaintiff's allegations before answering or otherwise responding. Moreover, this office needs time to determine, pursuant to Section 50-k of the New York General Municipal Law, and based upon a review of the facts of the case, whether we may represent the

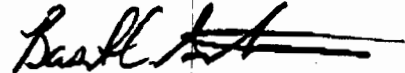
¹ Although presently proceeding *pro se*, plaintiff has informed me that she is currently seeking representation. As such, this extension is also sought by plaintiff so that she may have additional time to retain counsel.

individually-named defendant: Captain John Denesopolis. *See Mercurio v. The City of New York, et al.*, 758 F.2d 862, 864-65 (2d Cir. 1985) (quoting *Williams v. City of New York, et al.*, 64 N.Y.2d 800, 486 N.Y.S.2d 918 (1985) (decision whether to represent individual defendants is made by the Corporation Counsel as set forth in state law). As such, this office respectfully requests that Captain Denesopolis's time to answer or otherwise respond to the complaint also be extended until July 9, 2008.

In view of the foregoing, it is respectfully requested that the Court grant the within request extending the NYPD and John Denesopolis' time to answer or otherwise respond to the complaint until July 9, 2008.

Thank you for your consideration in this regard.

Respectfully submitted,



Basil C. Sitaras (BS-1027)
Assistant Corporation Counsel

cc: Tamara Golsten-Green (Via First-Class Mail)
Plaintiff Pro Se
5955 Waterford Drive
Grand Prairie, Texas 75052

Grated.

SO ORDERED: DATE: 6/9/2008
GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE

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